

Hearing Date: TBD
Objection Deadline: TBD

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

Case No. 17-BK-3283 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA

Title III

Case No. 17-BK- 3567 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,

Debtor.

PROMESA

Title III

Case No. 17-BK-3566 (LTS)

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Hearing Date: TBD
Objection Deadline: TBD

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA

Title III

Case No. 17 BK 4780-LTS

**FOURTH OMNIBUS MOTION TO EXTEND DEADLINES IN ORDER GRANTING
OMNIBUS MOTION BY THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO, ACTING BY AND THROUGH THE MEMBERS OF
THE SPECIAL CLAIMS COMMITTEE AND THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO (I) ESTABLISH LITIGATION CASE MANAGEMENT
PROCEDURES AND (II) ESTABLISH PROCEDURES FOR APPROVAL OF
SETTLEMENTS**

TABLE OF CONTENTS

TABLE OF CONTENTS.....	1
PRELIMINARY STATEMENT	2
JURISDICTION, VENUE, AND STATUTORY BASES	4
FACTUAL BACKGROUND.....	4
I. The Procedures Order	4
II. The Current Situation.....	5
RELIEF REQUESTED.....	6
ARGUMENT	7
I. The Movants Have Demonstrated Good Cause to Extend the Procedures Order Litigation Deadlines.....	7
REQUEST FOR HEARING.....	9
NOTICE	9
EXHIBIT A PROPOSED FOURTH EXTENSION ORDER	11

To the Honorable United States Magistrate Judge Judith G. Dein:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), acting by and through the members of the Special Claims Committee (the “SCC,” and hereinafter, the SCC may be more broadly referred to as the “Oversight Board”), and the Official Committee of Unsecured Creditors of all Title III Debtors (except COFINA and PBA) (the “Committee,” and together with the Oversight Board, “Movants”), hereby file this motion (the “Motion”), pursuant to section 105(a) of title 11 of the United States Code (the “Bankruptcy Code”)² and Rules 7016, 2002, 9006, and 9019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), all made applicable to these Title III cases by section 301 and 310 of the Puerto Rico Oversight and Management, and Economic Stability Act (“PROMESA”), requesting that this Court extend certain deadlines established in the *Order Granting Omnibus Motion By The Financial Oversight And Management Board For Puerto Rico, Acting By And Through The Members Of The Special Claims Committee And The Official Committee Of Unsecured Creditors To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For Approval Of Settlements*, ECF No. 7941 in Case No. 17-3283 (the “Procedures Order”), and later extended by subsequent orders and requesting entry of an order, substantially in the form attached hereto as Exhibit A (the “Fourth Extension Order”).³ Movants have filed this Motion in an omnibus fashion to avoid the burden and redundancy associated with preparing and filing nearly identical motions in numerous adversary proceedings. In support of this Motion, Movants respectfully state as follows:

² 11 U.S.C. §§ 101 *et seq.*, as incorporated into these proceedings by PROMESA, defined above.

³ See ECF No. 9476 in Case No. 17-3283 (the “Extension Order”); ECF No. 12528 in Case No. 17-3283 (the “Second Extension Order”); and ECF No. 13936 in Case No. 17-3283 (the “Third Extension Order”).

PRELIMINARY STATEMENT⁴

1. In and around April 2019, Movants filed approximately 250 adversary proceedings against vendors and suppliers to the Commonwealth of Puerto Rico seeking to avoid and recover payments made under fraudulent and preferential transfer theories (the “Vendor Avoidance Actions”). Around the same time as Movants filed the adversary proceedings, Movants entered into approximately 100 tolling agreements with vendors to toll the statute of limitations under similar fraudulent and preferential transfer theories.

2. Since April 2019, and in accordance with the Procedures Order, the Movants have attempted to informally resolve these proceedings without the need for formal litigation and without taxing the Court’s resources. As part of these efforts, Movants provide defendants information concerning their assessment of potential liability, and defendants have the opportunity to submit contracts, purchase orders, invoices and other similar documents to substantiate the payments at issue in the Vendor Avoidance Action (the “Information Exchange”).

3. Since April 2019, the Information Exchange process has been complicated and made more difficult by circumstances out of the control of both the Movants and the defendants. On January 7th, 2020, a magnitude 6.4 earthquake hit Puerto Rico, causing extensive damage and destruction. Furthermore, the COVID-19 pandemic has created a host of logistical challenges. Numerous vendors and their counsels to shelter in their homes. Many have become increasingly difficult to reach. Others have misplaced certain key documents that would otherwise be conveyed as part of the Information Exchange.

⁴ Capitalized terms used herein shall have the meaning ascribed to them in the Procedures Order, in the Extension Order, in the Second Extension Order, in the Third Extension Order and in this Motion.

4. Despite these challenges, the Movants have made significant progress to this point. To date, Movants have resolved approximately one hundred fifty-two (152) Vendor Avoidance Actions. Of the remaining one hundred-one (101) defendants, eighty-six (86) are actively engaged with Movants (the “Continued Engaged Defendants”). Movants expect to be able to achieve an informal resolution of these defendants’ claims pending a modest extension of the current Third Extended Litigation Deadlines (as defined below). Additionally, Movants have sought entry of default for approximately eleven (11) defendants who did not make an attempt to engage in the Information exchange and who did not move to dismiss or otherwise respond to their respective complaint in advance of the April 13, 2020 Extended Response Due Date (as defined below). There remain approximately four (4) defendants who have become unresponsive and are no longer engaging with Movants in the Information Exchange. Movants anticipate that they will move for entry of default with respect to these 4 defendants following the Third Extended Response Due Date (defined below) on December 16, 2020.

5. Movants wish to continue the momentum of the Information Exchange with the Continued Engaged Defendants rather than require these defendants to file responsive pleadings to the complaints. The commencement of formal litigation in December 2020 in light of the continued progress made by Movants and these defendants may be a premature, and perhaps an unnecessary use of the parties’ and the Court’s resources where defendants would otherwise broadly prefer to resolve the Vendor Avoidance Actions informally.

6. For these reasons, the Movants request that this Court grant another extension of the current Third Extended Litigation Deadlines with respect to the Continued Engaged Defendants (as listed in the Supplemental Appendix).

7. For clarity, the Movants are not seeking an extension of the current Third Extended Litigation Deadlines with respect to those defendants who are not constructively engaged in the Information Exchange and who are not included in the Supplemental Appendix.

JURISDICTION, VENUE, AND STATUTORY BASES

8. This Court has subject matter jurisdiction over this matter pursuant to section 306(a) of PROMESA.

9. Venue is proper pursuant to section 307(a) of PROMESA.

10. The statutory bases for the relief requested herein are section 105(a) of the Bankruptcy Code and Federal Rules of Bankruptcy Procedure 7016, 2002, 9006 and 9019.

FACTUAL BACKGROUND

I. The Procedures Order

11. The Movants incorporate by reference the “Factual Background” section of the *Omnibus Motion By The Financial Oversight And Management Board For Puerto Rico, Acting By And Through The Members Of The Special Claims Committee, And The Official Committee Of Unsecured Creditors To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For The Approval Of Settlements* ECF No. 7325, Case No. 17-3283 (the “Procedures Motion”).

12. This Court granted the Procedures Motion. *See* Procedures Order.

13. The Procedures Order established deadlines (together, the “Procedures Order Litigation Deadlines”) to facilitate the informal, extrajudicial resolution of the Vendor Avoidance Actions, including (i) a deadline for a defendant to file and serve an answer or response to a Vendor Avoidance Action complaint (the “Response Due Date”); (ii); a deadline for Movants to file an opposition to a motion to dismiss a Vendor Avoidance Action complaint

(the “Motion to Dismiss Response Date”); and a deadline for defendant to file a reply to motion to dismiss (the “Reply Deadline”).

14. Concurrent with entry of the Procedures Order, the Movants began to work diligently with the defendants (and parties that signed tolling agreements) to attempt to settle or dismiss the Vendor Avoidance Actions through the Information Exchange. Since entry of the Procedures Order, this Court has granted several extensions to the Procedures Order Litigation Deadlines so as to enable Movants and defendants to continue to work towards an informal resolution of the Vendor Avoidance Actions.⁵ Pursuant to the Third Extension Order, the current deadline for a defendant to file and serve an answer or response to a Vendor Avoidance Action complaint is December 16, 2020 (the “Third Extended Response Due Date”).

II. The Current Situation

15. Movants have continued to work diligently at all times since the Procedures Order towards a resolution of the outstanding Vendor Avoidance Actions. To date, Movants have resolved approximately one hundred fifty-two (152) Vendor Avoidance Actions. The Movants have moved for default judgment in another eleven (11) adversary proceedings and expect to move for entry of default in four (4) more. There remain approximately eighty-six (86) defendants who have yet to resolve their lawsuits but remain engaged with the Movants in productive conversations and exchanges of information. The Movants are optimistic that many or all of these defendants will be able to informally resolve their respective lawsuits if given more time to work with the Movants.

16. The earthquakes in Puerto Rico and complications from COVID-19 globally have created significant challenges to the Information Exchange process. The Movants have had

⁵ See Extension Order (ECF No. 9476 in Case No. 17-3283), Second Extension Order (ECF No. 12528 in Case No. 17-3283), and Third Extension Order (ECF No. 13936 in Case No. 17-3283).

difficulty continuing communications with defendants. Meanwhile, defendants have reported inabilities to return to their offices or otherwise facilitate the exchange of information with the Movants. Despite these challenges, the Movants' professionals have seen and continue to expect continued efforts by the Continued Engaged Defendants to maintain the requisite lines of communication with the Movants and facilitate the exchange of relevant information. However, the Movants' professionals anticipate that they will be unable to collect, review, analyze, and negotiate resolutions of claims against all defendants presently participating in the Information Exchange by the Third Extended Response Due Date.

17. Accordingly, the Movants respectfully assert that maintaining the current Third Extended Litigation Deadlines will disrupt the flow of the Information Exchange and require premature formal litigation unless modestly extended as set forth below.

18. The Movants believe there is a reasonable likelihood of a successful informal resolution for approximately eighty-six (86) defendants, the Continued Engaged Defendants. By this Motion, the Movants seek to extend the Third Extended Litigation Deadlines for the Continued Engaged Defendants to allow sufficient time to complete the Information Exchange.

RELIEF REQUESTED

19. The Movants respectfully request that this Court amend the Procedures Order to (i) extend the Response Due Date to April 16, 2021; (ii) extend the Motion to Dismiss Response Date to June 16, 2021; and (iii) extend the Reply Deadline to July 16, 2021 (together, the "Fourth Extended Litigation Deadlines") with respect to the Continued Engaged Defendants.

ARGUMENT

I. The Movants Have Demonstrated Good Cause to Extend the Procedures Order Litigation Deadlines.

i. Diligence Governs the Good Cause Inquiry.

20. The Movants incorporate by reference the entirety of the legal arguments in the “Basis for Relief Requested” section of the Procedures Motion as if fully set forth herein.

21. As additional support for the relief requested herein, the Movants respectfully submit that they have shown good cause for an extension of the Third Extended Litigation Deadlines because they have been diligent in resolving and/or settling the Vendor Avoidance Actions

22. “Once a Case Management Order has been issued and the Court has set a schedule for the proceeding, the ‘schedule shall not be modified except upon a showing of good cause.’” *Citadel Broad. Co. v. Peak Broad., LLC*, CV-07-203-S-LMB, 2008 WL 11463664, at *2 (D. Idaho Jan. 24, 2008) (citing Fed. R. Civ. P. 16(b) and holding that good cause shown to extend deadlines where parties had worked diligently to proceed with discovery and potential settlement); *see also Bernardi Ortiz v. Cybex Int’l, Inc.*, CV 15-2989 (PAD), 2018 WL 2448130, at *10 (D.P.R. May 30, 2018) (holding that case management order schedule modifications require leave of court predicated on a showing of good cause and holding that extension of discovery deadline warranted where record did not show lack of diligence by moving party in pursuing discovery); *Gonzalez Melendez v. KMart Corp.*, CIV. 04-1067(DRD), 2005 WL 1847008, at *3 (D.P.R. July 29, 2005) (adopting good cause standard to determine if extension of deadlines in case management order warranted and declining to extend deadlines where moving party merely asserted that it had “too much work [and] electronic difficulties.”).

23. In turn, the primary consideration of the good cause standard is the “diligence of the party seeking the amendment.” *Citadel*, 2008 WL 11463664, at *2 (citing *Johnson v. Mammoth Recreation, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992)). A modification of the case management schedule is warranted where the parties cannot reasonably meet the deadlines despite the diligence of the party seeking the extension. *Id.* (internal citations omitted); *see also Intermountain Fair Hous. Council, Inc. v. Tassano*, 114CV00338EJLCWD, 2015 WL 5095319, at *2 (D. Idaho Aug. 28, 2015) (noting “good cause” means scheduling deadlines cannot be met despite a party’s diligence (citing 6A Wright, Miller & Kane, Federal Practice and Procedure § 1522.1 at 231 (2d ed.1990))).

ii. *The Movants Have Been Diligent in Their Efforts to Resolve and/or Settle the Vendor Avoidance Actions Prior to the Extended Response Due Date.*

24. In accordance with spirit and purpose of the Procedures Order to maximize the potential for out-of-court resolution of the Vendor Avoidance Actions and to minimize the burden on the parties’ and this Court’s resources, the Movants have, since entry of the Procedures Order, worked diligently to resolve and/or settle as many Vendor Avoidance Actions and tolling agreements as possible. As noted above, one hundred fifty-two (152) of approximately 250 lawsuits have been resolved consensually. Additionally, Movants have moved for default judgment against eleven (11) defendants and anticipate moving for entry of default against another four (4) prior to the December 16, 2020 Third Extended Response Due Date. There remain eighty-six (86) lawsuits that have not yet been resolved but which Movants believe there is a reasonable likelihood of informal resolution if the current litigation deadlines are extended.

25. To remain consistent with the spirit of the Procedures Order and Puerto Rican business community’s desire to resolve the Vendor Avoidance Actions in the most economical

way possible, the Movants respectfully request that the Court grant a further extension to the Third Extended Litigation Deadlines to permit the Movants to collect, review, and resolve certain Vendor Avoidance Actions. The Movants' professionals will not be able to do so by December 16, 2020.

26. Therefore, the Movants respectfully submit that they have met the good cause standard warranting this Court's implementation of the Fourth Extended Litigation Deadlines.

REQUEST FOR HEARING

27. The Oversight Board and the Committee hereby request that this Motion be heard during the December 9, 2020 omnibus hearing.

NOTICE

28. The Oversight Board has provided notice of this Motion to: (i) the Chambers of the Honorable Laura Taylor Swain; (ii) the Chambers of the Honorable Magistrate Judge Judith G. Dein; (iii) the Office of the United States Trustee for Region 21; (iv) AAFAF; (v) counsel for AAFAF; (vi) counsel for the Oversight Board; (vii) counsel for the Creditors' Committee; (viii) counsel for the Retiree Committee; (ix) the entities listed on the List of Creditors Holding the 20 Largest Unsecured Claims in COFINA's Title III case; (x) counsel to any other statutory committee appointed in these Title III Cases; and (xi) the defendants listed in the Supplemental Appendix through their counsel, if known, through their resident agent, or a representative.

WHEREFORE, Movants respectfully request that this Court enter an order substantially in form attached hereto as Exhibit A granting the relief requested herein and granting Movants such other relief as this Court deems just and proper.

Dated: November 18, 2020.

Respectfully submitted,

/s/ Sunni P. Beville

BROWN RUDNICK LLP

Sunni P. Beville, Esq. (*Pro Hac Vice*)
One Financial Center
Boston, MA 02111
Tel: (617) 856-8200
sbeville@brownrudnick.com

*Counsel to the Special Claims Committee of the
Financial Oversight and Management Board, acting by
and through its members*

/s/ Luc A. Despins

PAUL HASTINGS LLP

Luc A. Despins, Esq. (*Pro Hac Vice*)
James R. Bliss, Esq. (*Pro Hac Vice*)
Nicholas A. Bassett, Esq. (*Pro Hac Vice*)
G. Alexander Bongartz, Esq. (*Pro Hac Vice*)
200 Park Avenue
New York, New York 10166
Telephone: (212)318-6000
lucdespins@paulhastings.com
jamesbliss@paulhastings.com
nicholasbassett@paulhastings.com
alex bongartz@paulhastings.com

*Counsel to Official Committee of Unsecured
Creditors for all Title III Debtors (other than
COFINA) in Certain of the Avoidance Actions*

/s/ Kenneth C. Suria

ESTRELLA, LLC

Kenneth C. Suria (USDC-PR 213302)
Alberto Estrella (USDC-PR 209804)
P. O. Box 9023596
San Juan, Puerto Rico 00902-3596
Tel.: (787) 977-5050
Fax: (787) 977-5090

*Local Counsel to the Special Claims Committee of the
Financial Oversight and Management Board, acting by
and through its members*

/s/ Juan J. Casillas

CASILLAS, SANTIAGO & TORRES LLC

Juan J. Casillas Ayala, Esq., USDC - PR 218312
Luis F. Llach Zúñiga, Esq., USDC - PR 2231112
Israel Fernández Rodríguez, Esq., USDC - PR 225004
Juan C. Nieves-González, Esq., USDC - PR 231707
Cristina B. Fernández Niggemann, Esq., USDC - PR
306008
PO Box 195075
San Juan, PR 00919-5075
Tel.: (787) 523-3434
Fax: (787) 523-3433
jcasillas@cstlawpr.com
lllach@cstlawpr.com
ifernandez@cstlawpr.com
jnieves@cstlawpr.com
cfernandez@cstlawpr.com

*Counsel to the Official Committee of Unsecured
Creditors (other than COFINA and PBA)*

Exhibit A

Proposed Fourth Extension Order

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA

Title III

Case No. 17-BK-3283 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO HIGHWAYS AND
TRANSPORTATION AUTHORITY,

Debtor.

PROMESA

Title III

Case No. 17-BK- 3567 (LTS)

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE EMPLOYEES RETIREMENT SYSTEM OF THE
GOVERNMENT OF PUERTO RICO,

Debtor.

PROMESA

Title III

Case No. 17-BK-3566 (LTS)

¹ The Debtors in these Title III cases, along with each Debtor's respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK- 3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17-BK-3566 (LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), (iv) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17-BK-4780) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523 (LTS)) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

In re:

THE FINANCIAL OVERSIGHT AND MANAGEMENT
BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA

Title III

Case No. 17 BK 4780-LTS

**ORDER GRANTING OMNIBUS MOTION TO EXTEND DEADLINES IN ORDER
GRANTING OMNIBUS MOTION BY THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO, ACTING BY AND THROUGH THE
MEMBERS OF THE SPECIAL CLAIMS COMMITTEE AND THE OFFICIAL
COMMITTEE OF UNSECURED CREDITORS TO (I) ESTABLISH LITIGATION
CASE MANAGEMENT PROCEDURES AND (II) ESTABLISH PROCEDURES FOR
APPROVAL OF SETTLEMENTS**

Upon the motion dated November 18, 2020 (the “Motion”) of the Oversight Board,¹ acting by and through the members of the Special Claims Committee, and the Committee, pursuant to section 105(a) of the Bankruptcy Code and Federal Rules of Bankruptcy Procedure 7016, 2002, 9019 and 9006 made applicable to this proceeding by sections 301(a) and 310 of the Puerto Rico Opportunity Management and Economic Stability Act of 2016 (“PROMESA”), 48 U.S.C. § 2161(a); and the Court having jurisdiction over this matter under 28 U.S.C. 1331, and under section 306(a)-(b) of PROMESA, 48 U.S.C. §2166(a)-(b); and venue being proper under section 307(a) of PROMESA, 48 U.S.C. § 2167(a); and due and proper notice of the Motion having been provided, and it appearing that no other or further notice need be provided; and the Court having reviewed the Motion and any opposition thereto [and having heard the statements of counsel at the hearing held before the Court (the “Hearing”)]; and the Court having determined that the legal and factual bases set forth in the Motion [and at the Hearing] establish

¹ Capitalized terms used herein shall have the meaning ascribed to them in Motion unless otherwise noted.

just cause for the relief granted herein; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefore, it is hereby

ORDERED that the relief requested in the Motion is granted, and it is further

ORDERED that the Procedures Order Litigation Deadlines Established in the *Order Granting Omnibus Motion By The Financial Oversight And Management Board For Puerto Rico, Acting By And Through The Members Of The Special Claims Committee And The Official Committee Of Unsecured Creditors To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For Approval Of Settlements*, ECF No. 7941 in Case No. 17-3283 (the “Procedures Order”), the *Order Granting Omnibus Motion To Extend Deadlines In Order Granting Omnibus Motion By The Financial Oversight And Management Board For Puerto Rico, Acting By And Through The Members Of The Special Claims Committee And The Official Committee Of Unsecured Creditors To (I) Establish Litigation Case Management Procedures And (II) Establish Procedures For Approval Of Settlements*, ECF No. 9476 in Case No. 17-3283 (the “Extension Order”), further extended in the *Order Granting the Third Omnibus Motion to Extend Deadlines in Order Granting Omnibus Motion by the Financial Oversight and Management Board for Puerto Rico, Acting by and Through the Members of the Special Claims Committee and the Official Committee of the Unsecured Creditors to (I) Establish Litigation Case Management Procedures and (II) Establish Procedures for Approval of Settlements*, ECF No. 13936 in Case No. 17-3283 (the “Third Extension Order”) shall be extended for the defendants listed in the Supplemental Appendix to following dates:

- i. **Response Due Date:** April 16, 2021;
- ii. **Motion to Dismiss Response Date:** June 16, 2021;
- iii. **Reply Deadline:** July 16, 2021; and it is further

ORDERED that, except as modified by this Order, the Procedures Order shall otherwise remain in full force and effect; and it is further

ORDERED that this Court shall retain jurisdiction with respect to all matters relating to the interpretation and implementation of this Order.

Dated: _____, 2020.

Honorable Judith G. Dein
United States Magistrate Judge

SUPPLEMENTAL APPENDIX

Defendant	Adversary Proceeding No.
A NEW VISION IN EDUCATIONAL SERV & MATE	19-00061
Ambassador Veterans Services of Puerto Rico L.L.C.	19-00048
Armada Productions Corp.	19-00076
Bianca Convention Center, Inc.	19-00072
Bio-Nuclear of Puerto Rico, Inc.	19-00091
Bristol-Myers Squibb Puerto Rico, Inc.	19-00042
Caribbean Temporary Services, Inc.	19-00104
Caribe Grolier, Inc.	19-00051
CCHPR Hospitality, Inc	19-00116
Centro de Desarrollo Academico, Inc.	19-00053
Citibank, N.A.	19-00265
Clinica de Terapias Pediatricas, Inc.	19-00054
Community Cornerstones, Inc.	19-00043
Computer Learning Centers, Inc.	19-00055
Computer Network Systems Corp.	19-00150
Core Laboratories N.V. d/b/a Saybolt	19-00381
Corporate Research and Training, Inc.	19-00151
Creative Educational & Psychological Services, Inc.	19-00152
Didacticos, Inc.	19-00161
Distribuidora Lebron Inc.	19-00167
E. Cardona & Asociados, Inc.	19-00056
Eastern America Insurance Agency, Inc.	19-00279
Ecolift Corporation	19-00172
Empresas Arr Inc.	19-00084
Enterprise Services Caribe, LLC	19-00060
Evertec, Inc.	19-00044
Explora Centro Academico Y Terapeutico LLC	19-00143
Facsimile Paper Connection Corp.	19-00092
Fast Enterprises LLC	19-00266
FIRST HOSPITAL PANAMERICANO	19-00093
FP + 1, LLC	19-00148
GF Solutions, Inc.	19-00063
Gila LLC	19-00354
Girard Manufacturing, Inc.	19-00103

Defendant	Adversary Proceeding No.
GM Security Technologies, Inc.	19-00273
Great Educational Services Corporation	19-00277
GUIMERFE INC	19-00182
Hewlett Packard Puerto Rico, BV LLC	19-00183
Hospira Puerto Rico, LLC	19-00186
Huellas Therapy Corp.	19-00065
Institucion Educativa Nets, LLC	19-00067
International Surveillance Services Corporation	19-00202
Intervoice Communication of Puerto Rico Inc.	19-00068
Jose Santiago, Inc.	19-00075
Junior Bus Line, Inc.	19-00229
Law Offices Wolf Popper P.S.C.	19-00236
Macam S.E.	19-00255
Management, Consultants & Computer Services, Incorporated	19-00081
Manpower	19-00088
Merck Sharp & Dohme (I.A.) LLC	19-00276
Michica International Co., Inc.	19-00238
Microsoft Corporation	19-00290
MMM Healthcare, Inc.	19-00095
N. Harris Computer Corporation	19-00102
National Copier & Office Supplies, Inc.	19-00251
Nelson D. Rosario Garcia	19-00125
Netwave Equipment Corp.	19-00253
Oracle Caribbean, Inc.	19-00112
Pearson Education, Inc.	19-00245
Pearson Pem P.R., Inc.	19-00117
Postage By Phone Reserve Account	19-00181
Professional Consulting Psychoeducational Services, LLC	19-00188
Prospero Tire Export, Inc.	19-00196
Puerto Rico Supplies Group Inc.	19-00199
Puerto Rico Telephone Company, Inc.	19-00127
Quest Diagnostics of Puerto Rico, Inc.	19-00440
R. Cordova Trabajadores Sociales C S P	19-00138
Ready & Responsible Security, Inc.	19-00387
Reyes Contractor Group, Inc.	19-00220
Ricoh Puerto Rico, Inc.	19-00128

Defendant	Adversary Proceeding No.
Rocket Learning, LLC	19-00232
Rocket Teacher Training, LLC	19-00235
Rodriguez-Parissi & Co., C.S.P.	19-00155
Rosso Group, Inc.	19-00239
S & L Development S.E.	19-00243
S.H.V.P. Motor Corp.	19-00134
Seguros Colon Colon, Inc.	19-00130
Sesco Technology Solutions, LLC	19-00162
St. James Security Services, LLC	19-00145
Sucn Oscar Rodriguez Crespo	19-00165
T R C Companies	19-00168
Taller de Desarrollo Infantil y Prescolar Chiquirimundi Inc.	19-00049
Total Petroleom PR Corp	19-00114
Transporte Sonnel Inc	19-00149
Truenorth Corp.	19-00160
VIIV Healthcare Puerto Rico, LLC	19-00164